

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	
	§	Chapter 11
EAGLE PIPE, LLC, ¹	§	
	§	Case No. 20-34879 (MI)
Debtor.	§	

NOTICE OF PROPOSED FINAL BIDDING PROCEDURES ORDER

PLEASE TAKE NOTICE that on October 12, 2020, the Debtor filed its *Motion for (I) An Order (A) Approving Bidding Procedures and Certain Bid Protections, (B) Scheduling Bid Deadline, Auction Date, and Sale Hearing and Approving Form and Manner of Notice Thereof; and (C) Approving Cure Procedures and the Form and Manner of Notice Thereof; and (II) an Order Approving the Sale of Substantially all of the Debtor's Assets Free and Clear of Liens, Claims and Interests* [Docket No. 55] (the “Bidding Procedures Motion”).

PLEASE TAKE FURTHER NOTICE that attached hereto as Exhibit A is a proposed *Final Order Approving Bidding Procedures and Certain Bid Protections* (the “Final Bidding Procedures Order”).

PLEASE TAKE FURTHER NOTICE that attached hereto as Exhibit B is a redlined version of the Final Bidding Procedures Order, reflecting changes made from the version submitted with the Bidding Procedures Motion.

[Remainder of page intentionally left blank]

¹ The last four digits of Debtor's federal tax identification number are (1119).

Respectfully submitted this 30th day of October, 2020.

GRAY REED

By: /s/ Paul D. Moak

Paul D. Moak
Texas Bar No. 00794316
Aaron M. Kaufman
Texas Bar No. 24060067
Lydia R. Webb
Texas Bar No. 24083758
1300 Post Oak Blvd., Suite 2000
Houston, Texas 77056
Telephone: (713) 986-7000
Facsimile: (713) 986-7100
Email: pmoak@grayreed.com
akaufman@grayreed.com
lwebb@grayreed.com

PROPOSED COUNSEL TO THE DEBTOR

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 30, 2020 a true and correct copy of the foregoing pleading was served via CM/ECF to all parties authorized to receive electronic notice in this case.

/s/ Paul D. Moak
Paul D. Moak